

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-D and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara Binis  
Barbara Binis  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsmith.com

/s/ Erik W. Legg  
Erik W. Legg (WVSB 7738)  
FARRELL, WHITE & LEGG PLLC  
P.O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
ewl@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ James R. Dugan, II

James R. Dugan, II  
THE DUGAN LAW FIRM  
Suite 1000, One Canal Place  
365 Canal Street  
New Orleans, LA 70130  
504.648.0180 (phone)  
504.648.0181 (fax)  
jdugan@dugan-lawfirm.com  
*Attorney for Plaintiffs on Exhibit A*

/s/ Hunter J. Shkolnik

Hunter J. Shkolnik  
NAPOLI BERN RIPKA SHKOLNIK & ASSOCIATES  
Suite 7413  
350 Fifth Avenue  
New York, NY 10118  
212.397.1000 (phone)  
646.843.7603 (fax)  
hunter@napolilaw.com  
*Attorney for Plaintiffs on Exhibit B*

/s/ Howard L. Nations

Howard L. Nations  
THE NATIONS LAW FIRM  
Suite 208  
3131 Briarpark Drive  
Houston, TX 77042-3795  
713.807.8400 (phone)  
713.807.8423 (fax)  
charles@howardnations.com  
*Attorney for Plaintiffs on Exhibit C*

/s/ Merritt E. Cunningham

Merritt E. Cunningham  
SMITH STAG  
Suite 2800  
365 Canal Street  
New Orleans, LA 70130  
504.593.9600 (phone)  
504.593.9601 (fax)  
mcunningham@smithstag.com  
*Attorney for Plaintiffs on Exhibit D*

Dated: February 24, 2017

**EXHIBIT A – DUGAN LAW FIRM, LLC**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-CV-06382	Karin Becker, Herman Becker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT B – NAPOLI BERN RIPKA SHKOLNIK & ASSOCIATES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-08375	Virginia Lahnum v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT C – THE NATIONS LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-09541	Joyce Lynn Montgomery v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT D – SMITH STAG**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-16640	Karen Henry v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis